REMARKS

Claims 4-14, 18-28, 31, 34, 35, and 38-42 are pending. Claims 4, 18, 31, and 40 are

independent claims. Reconsideration and allowance of the above-referenced application are

respectfully requested.

Claims 4-14, 18-28, 31, 34, 35, 38, and 39 are allowed. Claim 42 is considered allowable

subject matter if rewritten in independent form including all of the limitations of the base claim

and any intervening claims. This indication of allowable subject matter is acknowledged. The

claim is retained.

Claims 40 and 41 are rejected under 35 U.S.C. 102(e) as allegedly being anticipated by

Dermer et al. (US 6,366,361), hereinafter "Dermer". This contention is respectfully traversed.

Independent claim 40 reads, "A computer program product, tangibly stored on a

computer-readable medium, for implementing a trap engine, comprising instructions operable to

cause a computer to implement an application programming interface operable to receive

asymmetry information defining a desired asymmetry of traps, and use the asymmetry

information to calculate a perpendicular distance a trap extends from an edge with reference to

an orientation of the edge on a printed page." (Emphasis added). The Office Action contends

that Dermer discloses a computer executing a stored program for generating a set of

asymmetrical traps and determining an edge distance to the trap orientation on the page. This

contention cannot be supported.

In this regard, Dermer describes an invention that modifies a vector image to be rendered

in rasterized form, so that traps may be correctly generated wherever peekers exist (col. 2, lines

12-14). Further, Dermer teaches a method for trapping a page description language (PDL) page, and detecting and correcting peeker colors (fig. 1, col. 3, lines 36-38). Furthermore, Dermer discloses that after peeker detection and correction has been performed, trapping can be performed using the effective interior and effective exterior colors of the edges on the page, and this trapping includes deciding whether and where to place traps, and if a trap is to be set, deciding what the color of the trap should be (col. 9, lines 44-49). Dermer does not describe creating traps with asymmetric widths, an application programming interface operable to receive asymmetry information defining a desired asymmetry of traps, or using the asymmetry information to calculate a perpendicular distance a trap extends from an edge with reference to an orientation of the edge on a printed page.

The cited portion of Dermer (col. 6, line 64 – col. 7, line 13) defines peeker distance and trap width, and describes a method to chose peeker distance for a trap width. Further, Dermer describes performing peeker detection and correction, followed by trapping using the effective interior and effective exterior colors of the edges on the page (col. 9, lines 43-45). Dermer's description of peeker detection and correction followed by trapping cannot be equated with creating traps with asymmetric widths or an application programming interface operable to receive asymmetry information defining a desired asymmetry of traps, and using the asymmetry information to calculate a perpendicular distance a trap extends from an edge with reference to an orientation of the edge on a printed page.

The computer program product of Dermer comprises instructions operable to cause a computer to perform peeker detection and correction, followed by trapping. As described in Dermer, peeker detection and correction, followed by trapping is not equivalent to implementing

an application programming interface operable to receive asymmetry information defining a desired asymmetry of traps, and using the asymmetry information to calculate a perpendicular distance a trap extends from an edge with reference to an orientation of the edge on a printed page. Thus, Dermer does not describe the subject matter of claim 40. Accordingly, independent claim 40 is allowable. Claim 41 is allowable at least for the above reasons.
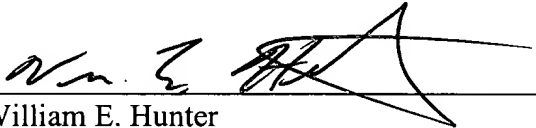
CONCLUSION

In view of the remarks herein, claims 4-14, 18-28, 31, 34, 35, and 38-42 are in condition for allowance and notice of allowance is respectfully requested. The foregoing comments made with respect to the positions taken by the Examiner are not to be construed as acquiescence with other positions of the Examiner that have not been explicitly contested. Accordingly, the arguments for patentability of a claim should not be construed as implying that there are not other valid reasons for patentability of that claim or other claims.

Please apply any necessary charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: July 28, 2006

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